

Freeborn & Peters LLP

July 30, 2009

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Re: Supplemental Request for Information Pursuant to Section 104(e) of
CERCLA for the Ore Knob Mine Superfund Site, Laurel Springs,
Ashe County, North Carolina

Dear Ms. Armor:

This is in response to the United States Environmental Protection Agency's ("USEPA") April 28, 2009 "Supplemental Request for Information Pursuant to Section 104(e) of CERCLA for the Ore Knob Mine Superfund Site, Laurel Springs, Ashe County, North Carolina" (the "Information Request") directed to Copper Range Company ("Copper Range"). Suzanne K. Armor of USEPA Region 4 agreed to give Copper Range an extension of time, until July 31, 2009, to submit this Response.

Preliminary Statement

Copper Range responds to the Information Request without waiver of or prejudice to its rights, at any later time, to raise objections to (a) the relevance, materiality or admissibility of such responses, or any part thereof, in any administrative proceeding or litigation; and (b) further demand for discovery involving or relating to matters raised by this Information Request. Also, the information contained in the responses set forth below is based upon information presently available to Copper Range. Further investigation and examination may disclose additional information and documents relating to these responses. Copper Range expressly reserves the right at any time to revise, correct, add to or clarify any of the statements herein as it identifies additional responsive information.

General Objections

The following objections apply to each and every response of Copper Range to the questions in USEPA's Information Request, whether or not expressly stated in response to any particular question.



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A. Copper Range objects to the Information Request to the extent that it seeks documents or information protected from disclosure by the attorney-client privilege. Inadvertent disclosure of privileged information by Copper Range shall not constitute a waiver of its attorney-client privilege.

B. Copper Range objects to the Information Request to the extent that it seeks documents or information protected from disclosure by the work-product doctrine. Inadvertent disclosure of privileged information by Copper Range shall not constitute a waiver of its claim under the work-product doctrine.

C. Copper Range objects to the Information Request to the extent that it seeks information and/or documents not within its possession, custody or control. Copper Range also objects to the overly-broad definition of "you" and "Respondent" to include Copper Range's "officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents." In answering, Copper Range will consider responsive only that information that is within the possession, custody or control of its officers, directors and direct employees.

D. Copper Range objects to the definitions of the terms "Site" and "facility" on the ground that they are unduly vague in meaning and scope.

RESPONSES TO INDIVIDUAL QUESTIONS

INTRODUCTION

On November 15, 1963, Appalachian Sulphides, Inc. ("Appalachian Sulphides") deeded a parcel of property consisting of a former mine (the Ore Knob Mine, referred to herein as the "Mine") to Copper Range. The Mine was located in Peak Creek Township, Ashe County, North Carolina. While the Mine and the Site both include the name "Ore Knob," it is not clear, based upon information in the Information Request, that the Mine is part of, or is connected or adjacent to, the properties that comprise the "Site" as defined therein. Furthermore, Copper Range has not located information suggesting that it undertook any activities at or adjacent to any of the "three principal areas" of contamination that USEPA has identified at the Site: "the 1950s Mine and Mill Area, the 19th Century Operations Area and a Main Tailings Impoundment." Copper Range deeded the Mine to Minaco Equipment Ltd. ("Minaco") on December 2, 1964.

Copper Range did not conduct mining operations during the short period that it held title to the Mine. Copper Range has located no information suggesting that it conducted any operations at the Mine while it held title. Copper Range has located no information suggesting that any hazardous substances were placed at the Mine when it owned the Mine, or that hazardous substances were released, or were threatened to be released, to the environment during that time period.

With this response, Copper Range is producing all documents that it has located within its possession, custody and control that relate to the Mine and that are responsive to the Information Request.

RESPONSES TO INDIVIDUAL QUESTIONS

Question #1: Identify the person(s) answering these Questions.

Response #1: Steve Astritis, Esq., Vice President, General Counsel and Secretary, Inmet Mining Corporation, Copper Range's corporate parent; and Director and Secretary of Copper Range;

Nadine Morrison, Assistant Corporate Secretary, Inmet Mining Corporation; and
Copper Range's attorneys, Freeborn & Peters LLP.

Question #2: For each and every Question contained herein, identify all persons consulted in the preparation of the answer.

Response #2: As a consequence of its very brief ownership of the Mine, which ended nearly forty-five years ago, Copper Range has not identified any individuals with direct knowledge of the Mine and matters addressed in the Information Request, and its answers are therefore based upon available documents.

Question #3: For each and every Question contained herein, identify all documents consulted, examined, or referred to in preparation of the answer or that contain information responsive to the Question and provide true and accurate copies of all such documents.

Response #3: With this response, Copper Range is producing true and accurate copies of all documents that it has identified within its possession, custody and control that are responsive to the Information Request and that have not already been

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produced as responsive documents to USEPA's August 5, 2008 "General Notice And Information Request Letter for the Ore Knob Mine Superfund Site in Ashe County, North Carolina" ("August 5, 2008 General Notice and Information Request").

Question #4: List all names under which your company or business has ever operated and has ever been incorporated.

Response #4: There have been two companies named Copper Range Company. The original Copper Range Company was incorporated in Michigan in 1899 and the second Copper Range Company was incorporated in Delaware in 1985.

For each name, provide the following information:

a. whether the company or business continues to exist, indicating the date and means by which it ceased operations (e.g., dissolution, bankruptcy, sale) if it is no longer in business;

Response #4a: The Michigan-incorporated Copper Range Company was merged into the Delaware-incorporated Copper Range Company in 1985 and ceased to exist. The Delaware-incorporated Copper Range Company still exists, but has not actively conducted business since 1997.

b. names, addresses, and telephone numbers of all registered agents, officers, and operations management personnel;

Response #4b: The following individuals are officers of Copper Range:

Steve Astritis, Esq., Secretary of Copper Range, c/o 330 Bay Street, Suite 1000, Toronto, Ontario, Canada MSH 2S8, telephone 1.416.860.3977;

Jochen Tilk, President of Copper Range, 330 Bay Street, Suite 1000, Toronto, Ontario, Canada MSH 2S8, telephone 1.416.860.3972.

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The registered agent for Copper Range is The Corporation Trust Company, located at Corporation Trust Center, 1209 Orange Street, Wilmington, DE 19801.

c. names, addresses, and telephone numbers of all subsidiaries, unincorporated divisions or operating units, affiliates, and parent corporations [sic] if any, of the Respondent.

Response #4c: Copper Range has a subsidiary named Unlimited Development Incorporated, which is inactive. Since 2000, Copper Range's parent company has been Inmet Mining Corporation ("Inmet"). Inmet's address is 330 Bay Street, Suite 1000, Toronto, Ontario, Canada M5H 2S8 and telephone number is 1.416.361.6400.

Question #5: Provide all copies of the Respondent's authority to do business in Delaware and Michigan. Include all authorizations, withdrawals, suspensions, and reinstatements.

Response #5: With this Response, Copper Range is producing Amended Applications for Certificate of Authority to Transact Business in Michigan that were filed with the Michigan Department of Commerce. Copper Range has already produced its Delaware Articles of Incorporation in response to USEPA's August 5, 2008 General Notice and Information Request (see Response #26).

Question #6: Provide all prospectus, brochures, or other printed material that has been or is currently being used to offer and/or promote the acquisition of shares or other interest(s) in the business.

Response #6: Copper Range has not located any information responsive to this Question.

Question #7: Provide a copy of all minutes of the meetings of the Board of Directors, Executive Committee, Finance Committee, Management Committee, and all other committees which the Company might have, from the date of incorporation in Michigan to the present.

Response #7: Copper Range objects to this request as being overly broad, and beyond the scope of CERCLA 104(e). Copper Range has not located any minutes of meetings of the Board of Directors, Executive Committee, Finance Committee, Management Committee, and all other committees that correspond to the time period during which Copper Range owned the Mine (November 15, 1963 until December 2, 1964) or that it owned the stock of Appalachian Sulphides (apparently July 1962 until its liquidation). Copper Range does have some minutes of the Board of Directors' meetings and various committee meetings starting from 1970s until present; however, these minutes concern matters that originated long after Copper Range sold the Mine and do not include any references to the Mine or Appalachian Sulphides.

Question #8: Provide a list of customers (e.g., smelters, mills, governments and industries) the Respondent had dealings with during the years the Respondent had property interests, mine leases, assignments, agreements, or arrangements with landowners at the Site, whether or not mining took place during those years.

Response #8: Copper Range has not located any information responsive to this

Question.

Question #9: Provide copies of minutes of meetings of Corporate Directors, for all the years during which the Respondent (or Respondent's predecessor) held assets at or property interests in the Site; whether or not mining took place during those years.

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Response #9: Copper Range has not located any minutes of meetings of Corporate Directors that correspond to the time period in which Copper Range held assets or property interests at the Mine.

Appalachian Sulfides, Inc. (a.k.a. Appalachian Sulphides, Inc.)

Question #10: Describe the nature and extent of any ownership interest that you may have had in Appalachian Sulfides, Inc. aka Appalachian Sulphides, Inc. ("Appalachian Sulfides"), a Delaware corporation, and when and how such ownership interest was acquired.

Response #10: According to the deed transferring the Mine to Copper Range, Copper Range held all of Appalachian Sulphides' outstanding stock. Also, according to a document of unknown authorship titled "Copper Smelting and Refining Practice at White Pine," Copper Range purchased the stock of Appalachian Sulphides in July 1962. A copy of this document is enclosed.

Question #11: Provide a history (e.g., payment dates, amounts received, etc.) of dividends received by you, or any of your subsidiaries, from Appalachian Sulfides resulting from your ownership of capital stock in Appalachian Sulfides.

Response #11: Copper Range has not located any information responsive to this

Question.

Question #12: Have you or any of your subsidiaries ever provided any assistance, guidance, advice, or input of any nature to Appalachian Sulfides in the preparation or formulation of Appalachian Sulfides' business strategy, business goals, budgets, forecasts, etc.? If so, explain in detail.

Response #12: Copper Range has not located any information responsive to this

Question.

Question #13: Have you or any of your subsidiaries ever made any loan(s) to Appalachian Sulfides? If so, provide complete information pertaining to such loan(s), including copies of all loan documentation (i.e., loan agreements, promissory notes, guarantees, security agreements, financing statements, amortization/payment tables), and complete information pertaining to any assignment, extension, composition, restructuring, etc. of such loan(s). For the purposes of this question, "loan" shall include the establishment of a line of credit by Copper Range or any of its subsidiaries for the use and/or benefit of Appalachian Sulfides, whether or not such a line of credit has ever been drawn on.

Response #13: Copper Range has not located any information responsive to this Question.

Question #14: Have you or any of your subsidiaries ever provided any clerical, administrative, professional or other services or assistance to Appalachian Sulfides? If so, provide a complete description of the nature of services or assistance provided, along with the time period(s) during which such services or assistance was provided.

Response #14: Copper Range has not located any information responsive to this Question.

Question #15: Have you or any of your subsidiaries ever leased or rented any furnishings, fixtures, equipment, personal, or real property to Appalachian Sulfides? If so, provide a complete description of the type of property leased or rented, and the terms and duration of such arrangement.

Response #15: Copper Range has not located any information responsive to this Question.

Question #16: Have you or any of your subsidiaries ever provided any training of any nature to any director, officer, or employee of Appalachian Sulfides? If so, provide a complete description of such training, including the nature of the training, who it was offered to, who participated in it (both as instructors and instructees), and when and where it was conducted.

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Response #16: Copper Range has not located any information responsive to this Question.

Question #17: Have you or any of your subsidiaries ever acted directly or indirectly to guarantee any loan made to Appalachian Sulfides? If so, provide complete information regarding such arrangement, including copies of all documents pertaining to such arrangement.

Response #17: Copper Range has not located any information responsive to this Question.

Question #18: Did any of the employees, officers, and/or directors of Appalachian Sulfides participate in any manner in any savings programs, ESOPs, pension plans, deferred compensation, or other arrangements offered or sponsored by you or any of your subsidiaries? If so, explain in detail.

Response #18: Copper Range has not located any information responsive to this Question.

Question #19: Was Appalachian Sulfides required to, or did Appalachian Sulfides receive, your approval or concurrence or the concurrence of any of your subsidiaries when making expenditures? If so, explain in detail.

Response #19: Copper Range has not located any information responsive to this Question.

Question #20: Have any of Appalachian Sulfides employees ever been employed by you or any of your subsidiaries? If so, provide each such employee's name, job title, and dates of employment.

Response #20: Copper Range has not located any information responsive to this Question.

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Question #21: Have you or any of your subsidiaries and Appalachian Sulfides ever had common directors? If so, provide the names and dates of service of such directors.

Response #21: Copper Range has not located any information responsive to this Question.

Question #22: Have Copper Range and Appalachian Sulfides ever filed consolidated tax returns? If so, provide complete copies of such returns.

Response #22: Copper Range has not located any information responsive to this Question.

Question #23: Is Copper Range the successor to all liabilities, including those under the Comprehensive Environmental Response, Compensation and Liability Act, as amended, by the Superfund Amendments and Reauthorization Act [sic] of Appalachian Sulfides?

Response #23: Copper Range objects to this Question to the extent that it asks for a legal conclusion. Copper Range denies that it is the successor to all Appalachian Sulfides' liabilities, including those under the Comprehensive Environmental Response, Compensation and Liability Act.

Question #24: If your answer to Question No. 23 above is "no," respond fully to the following questions:

Describe in detail Copper Range's past and current relationship with Appalachian Sulfides and the facility located at Ore Knob Mine in Ashe County, North Carolina.

Response #24: According to Copper Range's 1962 Annual Report, Copper Range purchased concentrates from Appalachian Sulphides for approximately two years

prior to purchasing the stock of the company. A copy of the 1962 Annual Report is enclosed.

Respond to each of the following questions:

a. State the date on which Copper Range acquired ownership or an interest in Appalachian Sulfides and the facility. State the prior owners, if any, of Appalachian Sulfides and the facility. Submit a copy of all documents relating to Copper Range's purchase of Appalachian Sulfides and the facility. Provide documentation on [sic] the amount Copper Range paid for its interest in Appalachian Sulfides.

Response #24a: According to a document of unknown authorship titled "Copper Smelting and Refining Practice at White Pine," Copper Range purchased the stock of Appalachian Sulphides in July 1962. See Copper Range's response to Question #8 of the August 5, 2008 General Notice And Information Request for previous owners of Appalachian Sulphides and the Mine. Appalachian Sulphides deeded the Mine to Copper Range on November 15, 1963.

b. Did the company sell or otherwise divest itself of any stock, assets, or other interest in Appalachian Sulfides or any other company which operated at the Site?

Response #24b: Copper Range has not located any information responsive to this Question.

c. If the answer to (b) is "yes," fully describe the nature of the sale and/or transaction. State if the transaction consisted of a merger, consolidation, sale, or transfer of assets, and submit all documents relating to such transaction, including all documents pertaining to any agreements, express or implied, for the purchasing corporation to assume the liabilities of the selling corporation.

Response #24c: No response is required.

d. Did Copper Range retain the liabilities of Appalachian Sulfides for events prior to the sale?

Response #24d: Copper Range objects to this Question to the extent that it asks for a legal conclusion. Copper Range has located no information suggesting that it retained any liabilities of Appalachian Sulphides.

Question #25: Identify all meetings and communications which the officers, directors, or employees of Appalachian Sulfides participated in or attended regarding the operations of the facility.

Response #25: See Copper Range's Responses to Questions #9 and #11 to the August 5, 2008 General Notice and Information Request. Copper Range has not located any additional information responsive to this Question.

Question #26: Identify what, if any, reports, statements, or other documents Copper Range's officers or directors wrote or received regarding the operations of the facility by Appalachian Sulfides and describe what, if any, information the officers and directors received concerning the operations of the facility by Appalachian Sulfides.

Response #26: See Copper Range's Responses to Questions #9 and #11 to the August 5, 2008 General Notice and Information Request. In addition, Copper Range's 1962 Annual Report refers to operation of the Mine by Appalachian Sulphides.

Question #27: Identify any employees, officers, or directors of Copper Range who participated in discussions or other communications regarding any decision to utilize or continue to utilize the Site for disposal of waste materials from the facility, including placement of mining tailings at the tailings impoundment.

Response #27: Copper Range has not located any information responsive to this Question.

Question #28: State whether any officers or directors of Copper Range approved, authorized, discussed, or had knowledge or awareness of any arrangement to dispose of wastes from the facility at the Site, including placement of mining tailings at the tailings impoundment. Describe the nature and extent of such approval, authorization, discussion, knowledge, or awareness.

Response #28: Copper Range has not located any information responsive to this Question.

Question #29: Were any reports discussing waste disposal practices at the Facility, including placement of mine tailings in the tailing impoundment, ever received by officers or directors of Copper Range? If your answer to this question is in the affirmative, indicate: (1) when such reports were received; (2) who the originator of such reports was; (3) who such reports were directed to; and (4) the contents of such reports. If such reports are in your possession or control, submit copies of such reports to EPA.

Response #29: Copper Range has not located any information responsive to this Question.

Question #30: Describe the circumstances surrounding the dissolution of Appalachian Sulfides, including in your answer the following:

a. the exact date of dissolution;

Response #30a: Copper Range has not located information responsive to this Question.

b. the names and addresses of any and all shareholders at the time of dissolution;

Response #30b: According to the deed transferring the Mine from Appalachian Sulphides to Copper Range, Copper Range held all outstanding stock at the time of Appalachian Sulphides' dissolution. At that time, Copper Range's headquarters were located at 630 Fifth Ave., New York 20, N.Y.

c. the value of all assets distributed to each shareholder as a result of the dissolution;

Response #30c: Copper Range has not located any information responsive to this Question.

d. the final disposition of all assets, liabilities, and shares of Appalachian Sulphides;

Response #30d: Appalachian Sulphides deeded the Mine to Copper Range on November 15, 1963. Copper Range has not located any other information responsive to this Question.

e. the identity of all parties to any transactions relating to or arising out of the dissolution;

Response #30e: Copper Range has not located any information responsive to this Question.

f. the identity of all documents relating to the dissolution.

Response #30f: Other than the deed transferring the Mine from Appalachian Sulphides to Copper Range, Copper Range has not located any information responsive to this Question.

Question #31: State whether any business records of Appalachian Sulfides are still in existence. If the answer is yes, state the location of these records and produce:

- a. all documents relating to the disposal of any wastes; and**
- b. all documents relating to the disposal of any hazardous substances, hazardous waste, or solid waste at the Site.**

Response #31: Copper Range has not located any information responsive to this Question.

Question #32: Identify any successor corporations or other entities of Appalachian Sulfides.

Response #32: Copper Range has not located any information responsive to this Question.

Question #33: If Appalachian Sulfides was a subsidiary of another corporation, identify such other corporation and state the dates during which the parent/subsidiary relationship existed and the names and addresses of that corporation's president, chairman of the board, and other officers.

Response #33: See Response #8 to the August 5, 2008 General Notice and Information Request. Copper Range has not located any additional information responsive to this Question.

Question #34: Describe any asset purchase agreements, whereby some or all of the assets of Appalachian Sulfides were ever sold to any other entity, including the date(s), the companies involved, and the terms of such asset purchase agreement(s).

Response #34: Copper Range has not located any information responsive to this Question.

Relevant Affiliations

Question #35: If you, your company, or any of you company's officers (current or former) have conducted business with any of the following, please describe the nature of that business, the individuals or companies involved, and the time period during which the business was transacted. Include any sales of assets, land, mineral rights, or equipment, or any negotiations for sales of assets, land, mineral rights, or equipment:

- a. Patiño Mining Corporation, a Canadian corporation;**
- b. Nipissing Mines Company, Ltd., a Canadian corporation;**
- c. Minaco Equipment, Ltd., a Canadian corporation; or**
- d. Ventures, Ltd., a Canadian corporation.**

Response #35: Copper Range has not located any information indicating that it conducted business with Patiño Mining Corporation, Nipissing Mines Company, Ltd., or Ventures, Ltd. Copper Range deeded the Mine to Minaco on December 2, 1964. Copper Range has not located any additional information responsive to this Question.

Copper Range Corporate History

Question #36: If Copper Range has had any changes in company name, ownership, or structure, or has obtained an interest in or dissolved itself of an interest in any other corporation, subsidiary, division, or other entity, identify such transaction. State if the transaction consisted of a merger, consolidation, sale, or transfer of assets. Submit all documents relating to such transactions including all documents pertaining to any agreements, or implied, for the purchasing corporation to assume the liabilities of the selling corporation.

- a. For each change in ownership, describe the type of change (i.e., asset purchase, corporate merger, or name change) as well as the date of the change in ownership.**

- b. For all asset purchases identified, please provide a copy of the asset purchase agreement.**
- c. For all corporate mergers identified, please provide a copy of the merger document.**
- d. Provide a copy of the agreement of sale as well as all attachments and amendments to this agreement of sale including related agreements such as exclusive service contracts, not-to-compete agreements, or consulting agreements that document each asset sold as well as the consideration paid for each and every asset.**
- e. Identify all consideration paid for Copper Range's assets. In identifying the consideration, provide the amount paid in cash, the amount paid in promissory notes or other form of debenture payable to the entity and/or officers, directors and/or shareholders of the entity selling the assets, the value associated with the assumption of liabilities) if assumption of liabilities are involved, you are also to identify the types of liabilities assumed), the value associated with the performance of services, the value associated with shares of stock exchanged as part of the sale, and the type and value associated with any other form of consideration not identified above.**
- f. For all promissory notes or other form of debenture identified in Question 36e above, has there been a renegotiation of the terms and conditions relating to this debt? If there has, describe the changes made and provide documentation that substantiates these changes. Furthermore, if any payment was late, reduced, or is in arrears, identify the amount of the payment, the original due date of the payment, and the number of days in arrears.**

Response #36:

1899- Copper Range Company was incorporated in Michigan.

1915- According to a document titled "Fifty Years on the South Range" (page 27), a copy of which is enclosed, Copper Range Consolidated Company was merged into Copper Range Company on a share to share basis. As a result of the merger, Copper Range Company acquired stock in Atlantic, Baltic and Trimountain Mining Companies, the Copper Range Railroad Company and a half-interest in the

Champion Copper Company (the other half being owned by St. Mary's Mineral Land Company). Copper Range has not located any documents directly relating to this merger.

1928- According to a document titled "Copper Range Company" (page 1 of the section Twilight Years), a copy of which is enclosed, Copper Range Company acquired an option in the Victoria hydro-electric development. Copper Range has not located any documents directly relating to this transaction.

1929- According to a document titled "Copper Range Company" (page 1 of the section Twilight Years), Copper Range Company purchased the White Pine Copper Company at a tax sale. Copper Range has not located any documents directly relating to this transaction.

1929- According to a document titled "Copper Range Company" (page 1-2 of the section Twilight Years), Copper Range Company exercised its option in the Victoria hydro-electric development jointly with the Middle West Utilities Company. Copper Range has not located any documents directly relating to this transaction.

1931- According to a document titled "Copper Range Company" (page 2 of the section Twilight Years), Copper Range Company took over the assets and debts of the Hussey Fabricating Plant. Copper Range has not located any documents directly relating to this transaction.

1931- According to a document titled "Copper Range Company" (page 2 of the section on St. Mary's Mineral Land Company), Copper Range Company

absorbed the St. Mary's Mineral Land Company and became the full owner of Champion Copper Company. Copper Range has not located any documents directly relating to this transaction.

November 1936- C. G. Hussey & Company merged into Copper Range Company. Copper Range Company owned 59,000 out of 65,000 shares and the non-owned shares were converted to Copper Range Company stock at a ratio of 2.5:1. With this Response, Copper Range is producing the Agreement of Merger document, dated November 24, 1936.

1947- According to a document titled "Copper Range Company" (page 2 of the section Twilight Years), the Copper District Power Company exchanged its assets for those of the Upper Peninsula Power Company. Copper Range has not located any documents directly relating to this transaction.

March 1950- According to a document titled "Copper Range Company" (page 2 of the section Twilight Years), Copper Range Company sold its stock in Upper Peninsula Power Company. Copper Range has not located any documents directly relating to this transaction.

November 1950- According to Copper Range's 1951 Annual Report To Shareholders, a copy of which is enclosed, White Pine Copper Company was incorporated in Delaware as a wholly-owned subsidiary of Copper Range Company. Copper Range has not located any documents directly relating to this event.

December 1956- According to Copper Range's 1956 Annual Report To Shareholders, a copy of which is enclosed, Copper Range Motor Bus Company dissolved. Copper Range has not located any documents directly relating to this dissolution.

July 1962- According to a document of unknown authorship titled "Copper Smelting and Refining Practice At White Pine" (page 1), a copy of which is enclosed, and Copper Range's 1962 Annual Report To Shareholders, a copy of which is enclosed, Copper Range purchased the stock of Appalachian Sulphides. Copper Range has not located any documents directly relating to this transaction.

1962-1963- Appalachian Sulphides dissolved. As part of this dissolution, Appalachian Sulphides transferred ownership of the Ore Knob Mine to Copper Range. Other than the deed, Copper Range has not located any documents directly relating to the dissolution of Appalachian Sulphides.

1968- According to Copper Range's 1968 Annual Report To Shareholders, a copy of which is enclosed, Copper Range acquired a 50% interest in Tubex Corporation. Copper Range has not located any documents directly relating to this acquisition.

1969- According to a document titled "Copper Range Company" (page 2 of the section Curtain), Copper Range Company erected its Northern Hardwoods plant. Copper Range has not located any documents directly relating to this event.

October 1970- According to Copper Range's 1971 Annual Report To Shareholders, a copy of which is enclosed, Copper Range acquired the remaining Tubex Corporation stock and formed the Tubex Division. Copper Range has not located any documents directly relating to this acquisition.

October 1971- According to the 1971 Annual Report To Shareholders, Copper Range sold the Tubex Division. Copper Range has not located any documents directly relating to this sale.

1971- According to the 1971 Annual Report To Shareholders, Copper Range acquired a majority interest in Unlimited Developments, Inc. Copper Range has not located any documents directly relating to this acquisition.

July 1977- Louisiana Land and Exploration Company, a Maryland corporation, acquired Copper Range Company. As part of this transaction, LL & E Delaware, a wholly-owned subsidiary of Louisiana Land and Exploration Company, was merged into Copper Range Company, the surviving corporation, via a stock swap. With this Response, Copper Range is producing a Certificate of Merger, filed May 24, 1977, and an Agreement of Merger, dated April 21, 1977.

December 1977- C.G. Hussey & Company, Inc.; Champion Copper Company; Saint Mary's Canal Mineral Land Company; Copper Range Exploration Company, Inc.; Contemporary Research, Inc.; and White Pine Copper Company, all wholly owned subsidiaries of Copper Range Company, were merged into Copper

Range Company. With this Response, Copper Range is producing a copy of the Certificate of Merger, dated December 22, 1977.

1978- Smoky Valley Mining Company, a wholly-owned subsidiary of Copper Range Company, was merged into Copper Range Company. With this Response, Copper Range is producing a copy of the Certificate of Merger, filed December 29, 1978.

December 1979- Copper Range Railroad Company is dissolved. With this Response, Copper Range is producing a copy of the Certificate of Dissolution, dated December 28, 1979.

June 1982- According to a document titled "Copper Range Company" (page 2 of the section Curtain), Northern Hardwoods was sold to Mead Corporation. Copper Range has not located any documents directly relating to this transaction.

1985- Louisiana Land and Exploration Company sold Copper Range Company to Echo Bay Mines (a wholly-owned subsidiary of Kinross Gold Corporation). Copper Range has not located any documents directly relating to this transaction.

November 1985- Echo Bay Inc., a subsidiary of Echo Bay Mines, sold its stock in Copper Range Company to Northern Copper Corporation for \$3.7 million in cash and \$20 million in the form of a Silver Agreement. As part of the same transaction, Northern Copper Corporation merged Copper Range Company (a Michigan corporation) into an identically named Delaware corporation (Copper

Range Corporation). Finally, Northern Copper Corporation was merged into the Delaware-incorporated Copper Range Corporation. With this Response, Copper Range is producing the Share Sale and Purchase Agreement between Echo Bay, Inc., Northern Copper Corporation and Copper Range Company, dated October 1, 1985; the Silver Agreement between Echo Bay Inc., Northern Copper Corporation and Copper Range Company (a Michigan corporation), dated October 1, 1985; the Agreement and Plan of Merger between Northern Copper Corporation and Copper Range Company (a Delaware corporation), dated November 7, 1985; and the Agreement and Plan of Merger between Copper Range Company (a Delaware corporation) and Copper Range Company (a Michigan corporation), dated November 7, 1985.

April 1989- Metall Mining Corporation, a Canada corporation, bought Copper Range Company and merged CRC Acquisition Company into Copper Range Company. As a result of the transaction, Copper Range was a directly-owned subsidiary of MMC Holdings, Inc, a Delaware corporation and a wholly-owned subsidiary of Metall Mining Corporation. With this Response, Copper Range is producing a Certificate of Merger of CRC Acquisition Company Into Copper Range Company and an Agreement And Plan Of Merger between Copper Range Company, Metall Mining Corporation, MMC Holdings Inc. and CRC Acquisition Company, dated April 25, 1989.

December 2000- Copper Range Company became a directly-owned subsidiary of Inmet Mining Corporation (formerly Metall Mining Corporation) when MMC Holdings, Inc. was completely liquidated into Inmet Mining Corporation on December 20, 2000. See the enclosed Unanimous Written Consent Resolutions Of The Board of Directors of Copper Range.

Question #37: List the complete legal names of the corporations created, renamed, merged, or dissolved through such transactions and identify which such action applies to which corporation.

Response #37:

- Appalachian Sulphides- dissolved.
- Atlantic, Baltic and Trimountain Mining Companies- status unknown.
- C. G. Hussey & Company- merged into Copper Range Company (a Michigan corporation).
- Champion Copper Company- merged into Copper Range Company (a Michigan corporation).
- Contemporary Research, Inc.- merged into Copper Range Company (a Michigan corporation).

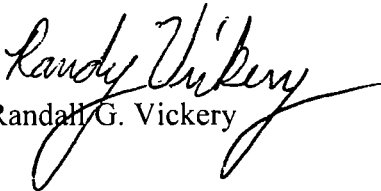
- Copper Range Company (a Michigan corporation)- incorporated in 1899 and involved in all mergers as surviving corporation, until 1985, when it was merged into Copper Range Company (a Delaware corporation) and ceased to exist.
- Copper Range Company (a Delaware corporation)- created in 1985 as the corporate survivor of Northern Copper Company's purchase of Copper Range Company (a Michigan corporation). Subsequently, Copper Range Company was purchased by Metall Mining Corporation and, as a result of the purchase, was the surviving entity of a merger with CRC Acquisition Company.
- Copper Range Consolidated Company- merged into Copper Range Company (a Michigan corporation).
- Copper Range Exploration Company, Inc.- merged into Copper Range Company (a Michigan corporation).
- Copper Range Motor Bus Company- dissolved.
- Copper Range Railroad Company- dissolved.
- CRC Acquisition Company- merged into Copper Range Company (a Delaware corporation).

- Hussey Fabricating Plant, assets and debts acquired by Copper Range Company (a Michigan corporation).
- LL & E Delaware- merged into Copper Range Company (a Michigan corporation).
- Northern Copper Corporation- merged into Copper Range Company (a Delaware corporation).
- Saint Mary's Canal Mineral Land Company- merged into Copper Range Company (a Michigan corporation).
- Smoky Valley Mining Company- merged into Copper Range Company (a Michigan corporation).
- St. Mary's Mineral Land Company- unknown, may be the same company as Saint Mary's Canal Mineral Land Company (see above).
- Tubex Corporation- acquired by Copper Range Company (a Michigan corporation) and became Tubex Division. Tubex Division sold to unknown purchaser.
- White Pine Copper Company- purchased at a tax sale in 1929. In 1950, incorporated in Delaware as a wholly-owned subsidiary of Copper Range

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Company. Merged into Copper Range Company (a Michigan corporation) in
1977.

Sincerely,


Randall G. Vickery

RGV

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7/30/09